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# Great Lakes Aviation, LTD

TSA-02-11604-16

April 4, 2002

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DEPT OF TRANSPORTATION

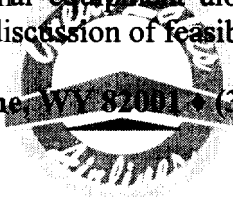
Dear Sir,

In formulating a response to the issues proposed under Docket Number TSA-2002-11604, several factors must be reviewed and considered. While on the surface it would seem like this one-size-fits-all approach is the way to go it does not work. Even with the recent changes to the Federal Aviation Regulations, the FAA has acknowledged the different needs of operators of "Transport" and "Non-Transport" Category aircraft.

I would agree with the need to heighten security and background checks for all operators, especially those operating into and out of secure areas as is addressed in this docket. However, the portion of the docket that addresses "Flight Deck Privileges" creates some questions and problems for operators of "Non-Transport Category Aircraft". Section 1544.237 requires all aircraft with a door to the flight deck, to restrict access to the flight deck through their security program. This is somewhat vague and unclear as to what the TSA is trying to state. Further, a definition of "door" would be helpful as many "Non-Transport Category Aircraft" are fitted with a partition between the passenger area and flight deck, but this partition was never intended to act as a door. Nor would this partition ever be able to meet strength standards to stop intrusion into the flight deck. Which brings up the question, is the TSA suggesting that the operators of "Non-Transport Category Aircraft" now create strengthen and locked cockpit doors, even though the FAA through its SFAR 92-4 has indicated this is not necessary? If so, what set of guidelines is the TSA giving as to what phases of flight this action of closing the newly created doors should take place? And finally, is this proposed action a coordinated effort with the FAA?

Since "Non-Transport Category Aircraft" typically operate without a flight attendant on board, the flight crew in addition to flying the aircraft is charged with the passenger's well being. Currently, this task would be impossible with a door closed at all times. Along that same line, "Unaccompanied Minors" are frequent travelers and require additional checking on during flight, again with a door closed this task could not currently be accomplished. A possible solution would be to install additional equipment to allow the flight crew to monitor the cabin from the flight deck with a closed door, however the installation of additional equipment along with a new strengthened and locked flight deck door leads to the discussion of feasibility.

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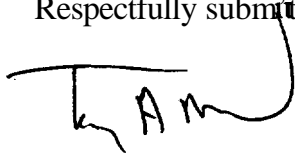
In discussing feasibility one must examine the additional equipment and its associated direct and indirect costs. This project of a new door would require a joint undertaking by aircraft manufactures to supply operators with a new forward bulkhead design to allow for a strengthened and locking cockpit door and a means to monitor cabin activity. Additionally, the new design would have to under go certification, and finally airlines would have to install this new bulkhead. Such a modification to the aircraft would result in a substantial weight gain. The additional weight to the aircraft would result in a reduction to the payload capability. On an aircraft with a typical seating configuration of less than twenty seats, any reduction in capacity would have a substantial impact on the already narrow profit margin of the aircraft, essentially rendering the aircraft economically useless to the operator.

In considering the risk factor and potential destruction capability of such an aircraft, one would have to consider the likelihood of a person targeting a smaller, "Non-Transport Category Aircraft", **as** listed in the Twelve-five rule for use **as** a potential weapon. While no one would claim **any** person that would do such a thing was of "normal mind". It would be a fair assumption that a normal person would not attempt to take all the actions and risks necessary to circumvent the heightened security measures at an airport to board an aircraft governed under this docket when an aircraft of comparable size and, God forbid, destruction capability could be rented much easier.

The TSA's docket further states in **1544.237 (b)** that this action should not interfere with an **FAA** inspector, NTSB agent, or other agents of the United States conducting enroute inspections. Meaning the cockpit doors could remain open during an enroute inspection. However, the **FAA** has specifically addressed this issue with "Transport Category Aircraft", which have a take-off weight well in excess of **12,500** pounds, in **SFAR 92-4**. Saying that with "Transport Category Aircraft" even in the case of authorized enroute inspections, the door to the cockpit is to remain closed. Therefore access to the cockpit is not authorized if it would result in the cockpit door remaining open, which is the case with smaller "Transport Category Aircraft". They do have a cockpit observer's seat, however to occupy this seat the cockpit doors must remain open. This issue clearly requires resolution, **as** it is a direct conflict with an existing **SFAR** issued by the **FAA**.

Based on the above comments I feel that while the intention of this docket is good, the result **of** its impact would be detrimental to the operators of "Non-Transport Category Aircraft", and should thereby be reconsidered or at least clarified before being administered **as** a final rule.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Tory A. Meisel". The signature is stylized with a large, sweeping "T" and "M".

Tory A. Meisel  
Assistant Director of Operations  
Great Lakes Aviation